

EXHIBIT G

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September 21, 2023

BY EMAIL

Maya Eckstein
Hunton Andrews Kurth LLP
951 E. Byrd St.
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**Re: Discovery Response Deficiencies *Doe v. Mast*, No. 3:22-cv-49-NKM
(W.D. Va.)**

Dear Ms. Eckstein:

As you know, we represent Joshua and Stephanie Mast in this matter. We write to address deficiencies in Plaintiffs' Objections and Responses to Defendants Joshua and Stephanie Mast's First and Second Requests for Production to Plaintiffs and Plaintiffs' Objections. We request an opportunity to meet and confer on these objections on or before Tuesday, September 27, 2023.

You have failed to produce many documents that we requested, failed to answer a single interrogatory, and provide severely deficient privilege logs.

While some documents have been produced, many of those include copies of documents first provided to you by the Masts. You have failed to (1) state what documents you are withholding or (2) provide a time when you will provide these documents, thereby violating Federal Rule of Civil Procedure 34(b)(2) and 34(c).

Improper Designations and Privilege Claims. You appear to be withholding communications with Martha Jenkins, Emily B. Markus, and Carolina Velasquez as subject to Attorney-Client Privilege, even after you abandoned in writing the privilege claim over a memorandum prepared by Ms. Jenkins for the USCCB. For the same reasons that document is not privileged, all communications with Ms. Jenkins, Ms. Markus and Ms. Rodriguez are not privileged.

You have marked many documents, including the belatedly produced Jenkins memorandum as "Highly Confidential Attorneys Eyes Only." There is no such category in the protective order and no basis to claim any document is attorney

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eyes only. I reached out to you last week about the designation on the Jenkins memorandum, but you have not responded or provided any legal basis for the bates stamping of any document “highly” confidential (undefined) or “attorney eyes only.”

Missing Documents. You have failed to produce many responsive documents that we have reason to believe are in your possession. As covered by numerous requests for production, this includes, but is not limited to the following:

- All documents provided to you by the Department of Justice.
- All documents provided to or by government actors (state, federal, local), including any involving law enforcement (but not limited to a law enforcement function).
 - Including the DHS preliminary inquiry from the October or November 2019 timeframe with Officer Ordum and McManus.
- Documents including a forensic copy of the A’s phones as provided to the F.B.I.
- Documents showing Bahloul’s national identity or identification card
- Documents showing pictures of Bahloul’s son
- Documents showing pictures of Baby Doe
- All communications from Haji Baba’s phone number as reflected on the WhatsApp communication with A.A.
- All communications between you and persons residing in Afghanistan since the Does’ came to the United States, at least as those communications relate to Baby Doe or the Doe’s safety concerns.
- All communications with news media, including communications from You, including communications from Jane Doe as described in her deposition in the related case.
- All documents relating to John or Jane Doe’s risk of harm related to this litigation.
- All documents with Project ANAR.
- Jane Doe asylum application.
- Baby Doe asylum application.
- Documents related to Jane Doe counseling records from Ft. Pickett

Improper Objections. Your objections to the Mast’s request for production are improper, including boilerplate objections to several requests based on “relevance” of responsive documents, a “law enforcement” connection, and for many, the presence of “classified information.” As you know, relevance is not a valid objection (the requests are proper and proportional). There is no “law enforcement” privilege. And any concern with “classified” information is misplaced. We assume, consistent with various legal obligations, you do not have any classified information in your custody and control.

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Given the boilerplate and indefinite responses to requests for production, the M's cannot ascertain whether the A's have provided all responsive documents, or intend to produce additional responsive documents.

Refusal to Answer or Provide Documents. Your blanket refusal to answer interrogatories is improper. For instance, Interrogatory No. 10 asks you to identify relatives of John Doe, Jane Doe, and Baby Doe. You refused to respond, based on relevance and burden. This is not a valid reason to refuse to provide any response. Likewise for Interrogatory No. 11, 12.

In addition, you have refused to provide documents with Project ANAR in response to Request Number 15, on the basis of (1) relevance, (2) burden, and (3) vagueness. Relevance is no ground to refuse to produce documents. There is no meaningful burden since it is likely the documents are few in number. As to the vagueness, the request for "all documents" and "all communications" is patently understandable and not vague. Requests for all documents or all communications are commonplace, and your own requests for production regularly called for "all documents." You have no reasonable basis to refuse to produce these documents.

* * *

This letter does not waive our ability to contest the remainder of Your deficient Responses to our Interrogatories and Requests for Production.

Please let us know when You have availability to confer.

Respectfully submitted,

/s/ Michael L. Francisco

John S. Moran

Michael L. Francisco (*pro hac vice*)

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